REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 12-23 remain pending, claims 12, 14, and 15 being independent. In this Reply, Applicants have amended claims 12 and 15.

Applicants appreciate the Examiner's indication that claim 14 is allowable. For at least reasons presented below, Applicants respectfully submit that all pending claims are allowable.

Prior Art Rejection

1. Section 102 Rejection: *Boyce*

Claims 12, 13, 15-17, and 20-21 stand rejected under 35 U.S.C. § 102 as allegedly being anticipated by *Boyce* (U.S. Patent 6,012,091). This rejection is respectfully traversed.

Independent claim 12 is directed to an image signal storage and reconstruction apparatus for receiving, storing and reconstructing a coded image signal fed from an image signal transmitting apparatus for use in a communication environment in which errors are likely to occur. The apparatus of claim 12 comprises: a storage and reconstruction control unit, which outputs an intra-frame request signal directing, in accordance with a request for storage, the image signal transmitting apparatus to continuously transmit the coded image signal in which the entirety of an image is intra-frame coded, and also outputs a storage start signal for carrying out a storage starting operation; and a coded signal storage unit, which extracts, in accordance with the storage start signal, the information indicating the coding mode of the entirety of an image from the coded image signal transmitted from the image signal transmitting apparatus, and starts storing the coded image signal when it is detected that the input coding image is the one in which the entirety of an image is intra-frame coded, thereby storing a coded image signal for non-disturbed video reconstruction.

Therefore, as emphasized by amendments presented herein, intra-coded image data is continuously provided for non-disturbed video reconstruction.

In maintaining the rejection of claim 12, the Office Action cites a controller 100 and a frame storage unit 320 (Fig. 4) of *Boyce* as allegedly corresponding to the storage and reconstruction control unit and coded signal storage unit of claim 12, respectively. See Final

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Office Action, page 3; Advisory Action, page 2. As discussed in the Reply dated October 12, 2005, *Boyce* discloses a video coder used in a video telecommunication server environment, e.g., for use in video phone services. In the system of *Boyce*, as illustrated in Fig. 1, encoded video data is decoded and re-encoded in a format that allows a server 20 to provide fast forward capability in response to requests from the user's video decoder apparatus. See e.g., col. 6, lines 47-60. In the embodiment cited in the Office Action as being relevant to claim 12, this is achieved by providing intra-coded frames in response to a fast forward command. See e.g., col. 10, lines 1-4. As described in the Abstract, the system of *Boyce* realizes n times fast scan play back by reproducing only frame signals of intra-frame coded data in every n-th frame.

Applicants submit, however, that *Boyce* fails to teach an image signal storage and reconstruction apparatus as claimed, in which an image signal transmitting apparatus continuously transmits a coded image signal in which the entirety of an image is intra-frame coded and in which a coded signal storage unit (allegedly corresponding to frame storage unit 320 of *Boyce*) extracts, in accordance with a storage start signal, information indicating the coding mode of the entirety of an image from the coded image signal and starts storing the coded image signal upon detecting that the input coding image is one in which the entirety of an image is intra-frame coded, thereby storing a coded image signal for non-disturbed video reconstruction. In contrast, the intra-frame coded frames in *Boyce* are not continuous and the reconstructed video is disturbed because it is based on frames selected every n frames. At least for this reason, *Boyce* fails to anticipate independent claim 12, or any claim depending therefrom.

Independent claim 15 is directed to an image signal storage and reconstruction apparatus for receiving, storing, and reproducing a coded image signal for use in a communication environment in which errors are likely to occur. The apparatus of claim 15 comprises: a storage and reconstruction control unit, which transmits a reconstruction start signal directing the start of reconstruction of the coded image signal stored in a coded signal storage unit, in accordance with a request for reconstruction, and an image decoding unit, which extracts, in accordance with the reconstruction start signal, the information indicating the coding mode of the entirety of an image from the coded image signal output from the coded signal storage unit, and starts

reconstructing the coded image signal when it is detected that the input coding image is the one in which the entirety of an image is intra-frame coded for non-disturbed video reconstruction.

In rejecting claim 15, the Office Action refers to the reasoning presented for rejecting claim 12. See Office Action, page 4. As noted above, and as described in the Abstract, the system of *Boyce* realizes n times fast scan play back by reproducing only frame signals of intra-frame coded data in every n-th frame. Therefore, the system of *Boyce* does not achieve the non-disturbed video reconstruction specified in claim 15. At least for this reason, Applicants submit that *Boyce* fails to anticipate claim 15, or any claim depending therefrom.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection under 35 U.S.C. § 102.

2. Section 103 Rejection: *Boyce – Isu*

Claims 18-19 and 22-23 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over *Boyce* in view of *Isu et al.* (U.S. Patent 6,862,320). This rejection is respectfully traversed.

As set forth on pages 4-5 of the Office Action, the Examiner relies on the secondary reference, *Isu*, as allegedly pertaining incremental features of the above-listed dependent claims. The Examiner's reliance on *Isu*, however, fails to make up for the deficiencies of *Boyce* discussed above with respect to the independent claims currently pending in the present application. Accordingly, the asserted combination (assuming these references may be combined, which Applicants do not admit) fails to establish *prima facie* obviousness of any pending claim.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection under 35 U.S.C. § 103.

Conclusion

Pursuant to the provisions of 37 C.F.R. § 1.17 and § 1.136(a), Applicants hereby petition for an extension of three (3) months in which to file a response to the outstanding Office Action. The required fee of $1020.00 is attached hereto concurrent with the filing of a Request for Continue Examination (RCE).

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Dated: January 12, 2006

Respectfully submitted,
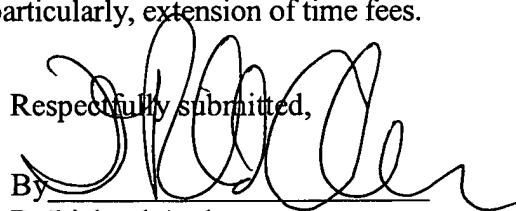
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